

IN THE UNITED STATES DISTRICT COURT FOR
THE SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

STAVANGER HOLDINGS, LTD and KARL ANDERSEN,)	
)	
)	
Plaintiffs,)	
)	
vs.)	Civil Action No.: 12 - 00646 (WTL)(DKL)
)	
TRANEN CAPITAL, LTD, TRANEN CAPITAL ALTERNATIVE INVESTMENT FUND, LTD., THE LEO GROUP, LLC, KENNETH A. LANDGAARD, and ARTHUR L. BOWEN,)	
)	
Defendants.)	

**PLAINTIFFS' MOTION TO ENFORCE A SETTLEMENT AGREEMENT
AND FOR A TELEPHONIC CONFERENCE**

Plaintiffs Stavanger Holdings, Ltd. ("Stavanger") and Karl Andersen ("Andersen") (collectively, the "Plaintiffs"), by and through their attorneys, Faegre Baker Daniels LLP and Duane Morris LLP, respectfully submit this motion seeking to enforce the terms of a settlement agreement between Plaintiffs and Defendants Tranen Capital, Ltd., Tranen Capital Alternative Investment Fund, Ltd., Kenneth Landgaard and Arthur Bowen (collectively, the "Tranen Defendants").

Plaintiffs also request a telephonic conference on this matter at the Court's earliest convenience because time is of the essence and the potential collateral consequence of the Tranen Defendants' non-compliance with the Agreement threatens to vitiate the purpose and value of the Agreement. Plaintiffs believe that the issues presented by this motion are straightforward and can be resolved over the telephone.

Because the terms of the Agreement are confidential, the details of Tranen Defendants' breach are set forth in the supporting Declaration of Mauro M. Wolfe, which is being filed separately under seal.

Dated: November 22, 2013
Indianapolis, IN

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*Attorneys for Plaintiffs Stavanger Holdings, Ltd.
and Karl Andersen*

CERTIFICATE OF SERVICE

I hereby certify that on this 22nd day of November 2013, a copy of the foregoing was filed electronically. Notice of this filing will be sent to all of the parties who have subscribed to the Court's electronic filing system. Parties may access this filing through the Court's system.

s/Ryan M. Hurley
Ryan M. Hurley